

1 Honorable Marsha J. Pechman
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 RICHARD J. ZALAC,
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11 Plaintiff,

12 v.
13 CTX MORTGAGE CORPORATION, a
14 Delaware Corporation; THE FEDERAL
15 NATIONAL MORTGAGE ASSOCIATION, a
16 United States Government Sponsored
17 Enterprise; JPMORGAN CHASE, a National
18 Association, d/b/a CHASE HOME FINANCE,
LLC., NORTHWEST TRUSTEE SERVICES,
INC., a Washington Corporation,
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., a
Delaware Corporation, and DOE
DEFENDANTS 1-10, Defendants,

19 Defendants.

20 No. 2:12-cv-01474
21
22 DECLARATION OF MICHAEL
23 SULLIVAN IN SUPPORT OF CTX
24 MORTGAGE COMPANY, LLC'S
25 MOTION TO DISMISS

26 MICHAEL SULLIVAN declares as follows:

1. I am the General Counsel of CTX Mortgage Company, LLC, one of the
defendants in the above matter. I am of legal age, have personal knowledge of the facts
contained in this declaration, and if asked to testify regarding them would and could competently
do so.

DECLARATION OF MICHAEL SULLIVAN IN SUPPORT OF CTX
MORTGAGE COMPANY, LLC'S MOTION TO DISMISS - 1
Case No. 2:12-cv-01474

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2. As Plaintiff alleges in ¶ 3.2 of his Amended Complaint, the loan between CTX Mortgage Company, LLC and Plaintiff was registered in the MERS registry under MIN No. 1000159-0220628056-0. Attached as Exhibit A is a true and correct copy of the MILESTONES report for MIN No. 1000159-0220628056-0. The MERS MILESTONES report confirms that on or about August 11, 2005, CTX Mortgage Company, LLC assigned to Bank of America N.A. all of its ownership and servicing rights to this loan; therefore, since August 2005, CTX Mortgage Company, LLC has neither been the owner or holder of the promissory note at issue, nor the servicer of Plaintiff's loan.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 19th day of September, 2012, at Englewood, Colorado.



MICHAEL SULLIVAN

DECLARATION OF MICHAEL SULLIVAN IN SUPPORT OF CTX
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CERTIFICATE OF SERVICE

As one of the attorneys of record for CTX Mortgage Company, LLC, I hereby certify that I electronically filed with the Clerk of the Court the foregoing pleading or document, and that the following parties or their counsel of record are registered as ECF Filers and will be served by the CM/ECF system as of today's date:

Richard Llewelyn Jones - rlj@richardjoneslaw.com
William Rasmussen - billrasmussen@dwt.com
Matt Sullivan - matthewsullivan@dwt.com
Heidi E. Buck - hbuck@rcolegal.com

DATED this 20th day of September, 2012 at Seattle, Washington.

/s/ Neil A. Dial
Tim J. Filer, WSBA No. 16285
Neil A. Dial, WSBA No. 29599
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Counsel for Defendant
CTX Mortgage Company, LLC

DECLARATION OF MICHAEL SULLIVAN IN SUPPORT OF CTX
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